

# EXHIBIT 14

**From:** [Sarah Fan](#)  
**To:** [Olivia Flechsig](#); [Tracey Kennedy](#); [Robert Mussig](#)  
**Cc:** [Dolores Leal](#); [Angie Paz](#); [Josie Pena](#)  
**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery  
**Date:** Tuesday, February 18, 2025 1:45:46 PM

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Hello Olivia:

I just called and left you a message regarding Defendant's responses and supplemental responses to Plaintiff's written discovery requests. Please let me know whether you will agree to extend Defendant's deadline to February 25, 2025, to provide responses to Plaintiff's third set of Interrogatories, fourth set of Requests for Production of Documents, and first set of Requests for Admission, and to provide supplemental responses to Requests for Production as we previously discussed.

We will stipulate that Plaintiff can request an IDC/motion to compel after the close of fact discovery if necessary, provided that Plaintiff agree to do so before the close of expert discovery on April 1st so that we can close out discovery in advance of the motion cutoff. If more time is needed to resolve any discovery issues, we can discuss further as we meet and confer.

I would appreciate if you could let me know your thoughts regarding the above at your earliest convenience.

Thanks,  
-Sarah

**Sarah Fan** | Associate  
**SheppardMullin** | Los Angeles  
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**From:** Olivia Flechsig <oflechsig@amglaw.com>  
**Sent:** Tuesday, February 11, 2025 3:30 PM  
**To:** Sarah Fan <SFan@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>  
**Cc:** Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>  
**Subject:** Re: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Dear Sarah,

Thank you for this update. Since February 24, 2025 is only one day before the close of fact discovery deadline, we will agree to accept the supplemental responses that day only if you will stipulate to allow us to, if needed, request an IDC and a motion to compel further responses notwithstanding the close of fact discovery.

Regarding RFP 19, we do require that you provide a privilege log for any documents which you have withheld based upon a claim of privilege so that we may evaluate the merits of the claim of privilege.

Regarding RFP 21, the request is already cabined as to time and subject matter (i.e. with references to/mentions of Mr. Snookal), so we do not think it's unduly burdensome.

Regarding RFP 33 and 34, I have gone back to look for the specific titles of relevant policies that have not yet been produced. It appears we are missing Chevron's "Corporate Policy 200 - Employment" (see reference at SNOOKAL-00069 "Corporate Policy 200-Employment provides that the ability to perform essential job functions is the determining factor in employment . . . ") and Chevron HR Policy 300 - Employment (see reference at SNOOKAL-00073). There may be others we do not know of because they were not referenced in documents already made available to us.

If you do not agree to the above regarding RFP 19, 21, 33, and 34, please let us know ASAP along with at least three times next week when we can try to schedule the IDC.

Thank You,  
Olivia

Olivia Flechsig, Esq.

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**From:** Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>  
**Sent:** Tuesday, February 11, 2025 12:00 AM  
**To:** Olivia Flechsig <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>  
**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>  
**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Hello Olivia:

In follow-up on the outstanding RFPs, we will agree to supplement Chevron USA's responses to RFP nos. 1 (with the exception of the harassment policies we discussed) and 15-18. We would appreciate additional time to supplement these responses – please let me know if February 24th will work for you.

In the meantime, please let me know at your earliest convenience Plaintiff's position regarding RFP nos. 19, 21, 33, and 34.

Thanks,  
-Sarah

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**From:** Sarah Fan  
**Sent:** Friday, February 7, 2025 6:40 PM  
**To:** 'Olivia Flechsig' <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>  
**Cc:** 'Dolores Leal' <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; 'Angie Paz' <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; 'Josie Pena' <[jpena@amglaw.com](mailto:jpena@amglaw.com)>  
**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Hello Olivia:

Thanks for the call on Wednesday. I'm tying up some details on my end regarding the written discovery responses we discussed. I'll get back to you on Monday regarding those.

Please let me know if you have any updates on your end as well, regarding RFP nos. 19, 21, 33, and 34.

Thanks,  
-Sarah

**Sarah Fan** | Associate  
**SheppardMullin** | Los Angeles  
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**From:** Sarah Fan

**Sent:** Tuesday, February 4, 2025 11:20 AM

**To:** 'Olivia Flechsig' <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>

**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>

**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Thanks, Olivia. Talk to you then.

-Sarah

**Sarah Fan** | Associate  
**SheppardMullin** | Los Angeles  
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**From:** Olivia Flechsig <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>

**Sent:** Monday, February 3, 2025 2:18 PM

**To:** Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>

**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>

**Subject:** Re: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Dear Sarah,

Thank you for your letter. I will plan to call you at 4:30 pm PST this Wednesday.

Best,  
Olivia

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**From:** Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>

**Sent:** Monday, February 3, 2025 12:07:32 PM

**To:** Olivia Flechsig <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>

**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>

**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Hello Olivia:

Thanks for your thoughts below. Since Plaintiff dismissed his age discrimination claim after most of the requests discussed in your meet and confer letter were propounded, and most of these requests were never previously raised in a meet and confer between the parties, we believe it makes sense for the parties to discuss the scope of the requests at issue. Please see attached a written response to your meet and confer letter.

Are you available this week to discuss the requests identified? My availability this week is somewhat limited due to prescheduled matters, but I'm available on Wednesday after 4:00 p.m., Thursday between 11:00 a.m.-12:00 p.m. and after 4:30 p.m., and Friday after 2:30 p.m. Please let me know what time works best for you.

Thanks,  
-Sarah

**Sarah Fan** | Associate  
**SheppardMullin** | Los Angeles  
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**From:** Olivia Flechsig <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>  
**Sent:** Monday, January 27, 2025 3:52 PM  
**To:** Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>  
**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>  
**Subject:** Re: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Dear Sarah,

We are loathe to extend the deadline to respond, particularly because we already met and conferred about several of these issues weeks or even months ago. In addition, at minimum, you should be able to agree to produce non-privileged responsive documents without additional preparation.

We will await your response on January 31st, and as always, I'm available to discuss over the phone as needed.

Best,  
Olivia

Olivia Flechsig, Esq.

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**From:** Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>

**Sent:** Thursday, January 23, 2025 11:20 PM

**To:** Olivia Flechsig <[oflehsig@amglaw.com](mailto:oflehsig@amglaw.com)>; Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>;  
Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>

**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena  
<[jpena@amglaw.com](mailto:jpena@amglaw.com)>

**Subject:** RE: Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Hello Olivia:

We are in receipt of your January 16th meet and confer letter. Given the number of Requests covered, we will need additional time evaluate whether supplemental responses and production can be made and in order to provide a considered response. We will plan to provide respond to your meet and confer letter on or before January 31st.

Please let me know if you would like to discuss in the meantime.

Thanks,

-Sarah

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**From:** Olivia Flechsig <[oflechsig@amglaw.com](mailto:oflechsig@amglaw.com)>  
**Sent:** Thursday, January 16, 2025 6:29 PM  
**To:** Tracey Kennedy <[TKennedy@sheppardmullin.com](mailto:TKennedy@sheppardmullin.com)>; Sarah Fan <[SFan@sheppardmullin.com](mailto:SFan@sheppardmullin.com)>; Robert Mussig <[RMussig@sheppardmullin.com](mailto:RMussig@sheppardmullin.com)>  
**Cc:** Dolores Leal <[dleal@amglaw.com](mailto:dleal@amglaw.com)>; Angie Paz <[apaz@amglaw.com](mailto:apaz@amglaw.com)>; Josie Pena <[jpena@amglaw.com](mailto:jpena@amglaw.com)>  
**Subject:** Snookal v. Chevron - Meet and Confer Letter Re: Document Discovery

Dear Counsel,

Please see my attached meet and confer letter concerning Chevron's deficient responses to Plaintiff Mark Snookal's Requests for Production of Documents.

Best,

Olivia

Olivia Flechsig, Esq.

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